

Partners Dawn M. Cardi Chad L. Edgar

Associates Jessica Friedrich Joanna C. Kahan

> Of counsel Diane Ferrone

Granted.

So ordered: 8/6/2021

August 6, 2021

Via ECF

Hon. J. Paul Oetken United States District Court Judge Southern District of New York 40 Foley Square New York, NY 10007

J. PAUL OETKEN United States District Judge

Re: <u>United States v. Ahmad Akbar</u>, 20-cr-563 (JPO)

Your Honor:

I am CJA counsel to Ahmad Akbar. I write, with support from pre-trial services, to modify Mr. Akbar's bail conditions to remove curfew with location monitoring. The Government has informed counsel that it defers to pre-trial services.

Mr. Akbar has been on pre-trial release since December 12, 2020. His pre-trial services officer, Leo Barrios, reports he has been in "full compliance." We also note that Mr. Akbar's wife is pregnant, and elimination of these bail conditions will be a big help to the family.

Accordingly, we respectfully request that the Court modify Mr. Akbar's current bail conditions to remove curfew with electronic monitoring. As noted, pre-trial services supports this request and the Government has indicated that it defers to pre-trial.

I thank the Court for its attention to this matter.

Respectfully submitted,

/s/

Dawn M. Cardi

CC: All Parties (via ECF)

Pre-Trial Services Officer Leo Barrios (via email)